UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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FEB 10 2014

Ref: EPR-N

Ruth Esperance, District Ranger
Mystic Ranger District
8221 South Highway 16
Rapid City, SD 57702

Re: Teckla-Osage-Rapid City Transmission Project
Draft Environmental Impact Statement
CEQ # 20130377

Dear Ms. Esperance:

In accordance with our responsibilities under Section 102(2) (C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Teckla-Osage-Rapid City Transmission Project Draft Environmental Impact Statement (EIS) as prepared by the United States Forest Service (USFS). It is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project, which includes a rating of the environmental impacts of the proposed action and the adequacy of the Draft EIS.

Project Description

Black Hills Power has requested a right-of-way (ROW) authorization to construct and operate a 230-kV transmission line from the Teckla and Osage Substations in northeastern Wyoming to the Lange Substation in the Rapid City area in South Dakota. The project, under Alternative 2 (Proposed Action), would be approximately 144 miles long. The transmission line would cross portions of the Black Hills National Forest and private lands in South Dakota and portions of the Thunder Basin National Grasslands, private lands, Bureau of Land Management (BLM) lands and state lands in Wyoming. The line would be constructed on wood or steel H-frame structures for most of its length with possibly some steel monopole structures in the Rapid City area. The support structures would be 65 to 75 feet tall, and the project would require a ROW of 100 feet on federal lands and 125 feet on private lands.

The EPA's Comments and Recommendations

The EPA appreciates the detail included for identifying, minimizing and repairing any impacts from noxious weed infestation in the Draft EIS. We also appreciate efforts to address our

comments for providing information on how impacts will be minimized, particularly in regard to hydrology, water quality, and wetlands. Our remaining comments and recommendations follow.

Wetlands Protection

The Draft EIS identifies that the Proposed Action ROW would cross less than one acre of wetlands in the State of South Dakota portion and just over a cumulative nine acres in Wyoming (of which the direct and indirect effects and impacts would be negligible). While the expected impacts to wetlands from the proposed action are identified as being negligible, the EPA recommends that the Final EIS specifically identify that during project implementation, the lead Federal Agencies will meet requirements under 33 CFR 320.3. This requirement specifically relates to the U.S. Army Corps of Engineers Nationwide Permit #12 for utility lines. It authorizes the construction, maintenance, or repair of utility lines, including outfall and intake structures, and the associated excavation, backfill, or bedding for the utility lines, in all waters of the United States where certain activities that have minimal individual and cumulative adverse effects on the aquatic environment will take place. Depending on the size of the wetlands potentially affected (as small as ½ an acre or greater) the Lead Federal Agency may be required to provide pre construction notice to the U.S. Army Corps of Engineers, or, depending on the circumstances, actually receive a permit prior to construction activity.

Air Emissions Mitigation and Fuel Conservation

While the Draft EIS identifies several positive steps that will be taken during construction to minimize road construction and traffic-related air emissions (primarily dust), we did not find procedures for minimizing engine idling or for use of clean diesel heavy equipment. These procedures are often used in the construction industry for minimizing mobile source air pollution, reducing fuel consumption and saving money. The EPA recommends that the Final EIS identify procedures for reducing vehicle emissions associated with the project.

Green House Gases

Sulfur hexafluoride (SF 6) is often used in electrical transmission equipment, including transformers and circuit breakers. The global warming potential of SF 6 is 23,900, making it the most potent greenhouse gas that the Intergovernmental Panel on Climate Change has evaluated (source: http://epa.gov/climatechange/ghgemissions/gases/fgases.html). According to EPA, the number of units in a power system that leak is 15% and of that 15%, 10% can be repaired. While this is a small subset of an entire system's equipment that may be releasing green house gases, due to the potency of SF 6, EPA recommends that the Final EIS identify what steps project proponents may take to either substitute SF 6 emitting equipment or mitigate the green house gas emissions from leaking electrical transmission equipment.

The EPA's Rating

Based on our review, the EPA is rating the Agency Preferred Alternative as "Environmental Concerns – Adequate" (EC1). The "EC" rating means the EPA's review has identified potential impacts that should be avoided to fully protect the environment. The "1" rating means that while

no further analysis or data collection is necessary, the EPA has suggests the addition of clarifying language or information. A full description of the EPA's rating system can be found at http://www.epa.gov/compliance/nepa/comments/ratings.html.

Thank you for your thoughtful consideration of the EPA's scoping comments and the opportunity to provide comments on the Draft EIS. If you have any questions or would like to discuss our comments or rating, please contact me at 303-312-6704, or the Lead Reviewer for this project, Nat Miullo at 303-312-6233.

Sincerely,

David Farnsworth

for Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystem Protection and Remediation